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2 District of Nevada
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7 Attorney for Thomas A. Cecrle

8
9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 * * *

12 UNITED STATES OF AMERICA,

2:12-cr-400-JAD-GWF

13 Plaintiff,

14 vs.

STIPULATION TO CONTINUE
SELF SURRENDER DATE
(First Request)

15 THOMAS A. CECRLE,

16 Defendant.

ORDER

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18 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United
19 States Attorney, and Steven W. Myhre, Assistant United States Attorney, counsel for the United
20 States of America, and Rene L. Valladares, Federal Public Defender, and William Carrico, Assistant
21 Federal Public Defender, counsel for THOMAS A. CECRLE, that the self surrender date for
22 Tuesday, June 2, 2015, be vacated and continued to July 14, 2015.

23 This Stipulation is entered into for the following reasons:

24 1. Since the time of sentencing, Tom Cecrle has been trying to place his mother in an
25 assisted living environment suitable for Alzheimer's patients.

26 2. Her income is insufficient to pay the costs, so he has been applying and attempting
27 to qualify her for assistance. Just recently, the State of Nevada informed him that they would not

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1 be able to place her until August 2015, however though intensified efforts by Tom, he is now
2 informed that the date has moved up to early July.

3 3. Tom Cecrle's surrender date is currently June 2, 2015. He has been designated to
4 Florence, Colorado where he is to self-surrender by 12:00 Noon. He had all arrangements made to
5 comply with that directive.

6 4. As late as May 26, 2015, the Nevada Alzheimer's Association told Mr. Cecrle that
7 they had to return some of his mother's paperwork due to some missing information on two pages.
8 Nonetheless, Mr. Cecrle remains confident that if the Court will permit him to self-surrender on July
9 14, 2015 by 12:00 noon, he will be able to meet his obligations to his mother, ensure her care as
10 much as possible, and also meet his obligations to this Court.

11 5. The defendant is not incarcerated and does not object to the continuance.

12 6. The parties agree to the continuance.

13 7. This is the first request for a continuance of the self surrender date filed herein.

14 DATED this 27th day of May, 2015.

15 RENE L. VALLADARES
16 Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

/s/ William Carrico

/s/ Steven W. Myhre

17 By: _____
18 WILLIAM CARRICO,
Assistant Federal Public Defender

By: _____
STEVEN W. MYHRE,
Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

2:12-cr-400-JAD-GWF

Plaintiff,

vs.

THOMAS A. CECRLE,

Defendant.

ORDER

Based on the pending Stipulation of counsel, and good cause appearing,

IT IS THEREFORE ORDERED that the self surrender date currently scheduled for Tuesday, June 2, 2015, be vacated and continued to 7/14/15 at the hour of 12:00 p.m.

DATED this 28th day of May, 2015.


UNITED STATES DISTRICT JUDGE